

DEC 17 1985

File	Disclosure	
Page #	2	Reviewer MHL

Richard Clute
Franklin Mfg. Co.
701 33rd Avenue N.
St. Cloud, Minnesota 56301

Dear Mr. Clute:

RE: Approval of Hazardous Waste Disclosure

The staff of the Minnesota Pollution Control Agency (MPCA) has completed the review of your Hazardous Waste Disclosure dated September 4, 1980 and revised through April 1, 1985. Your management plans for the following wastes are approved.

Waste Inventory
Number

Waste Name

H2	Paint Solvent
H5	Blue Surf Ash
H9	Cleaning Solvent, Halogenated
H10	Urethane, Foam Flush
H11	Mold Stripper Solvent
H14	Bonderite Parcolene 60
H15	Waste TDI
H16	Urethane, Waste Resin
H17	Mold Stripper Solids
H19	PCB Transformers
H20	PCB Capacitors
H21	Diphenylmethyl Diisocyanate (MDI)

Martin H. Little was the primary reviewer of your disclosure.

The signature on the disclosure certifies under oath that the information describing hazardous waste composition, quantities, and management practices is accurate. You are obligated to handle your wastes as described in the approved disclosure. The approval is subject to the following conditions:

1. If Franklin Mfg. begins to generate a new hazardous waste, a management plan shall be submitted to the MPCA within 75 days after first producing the waste. The new waste shall not be treated, disposed of, nor change possession until at least 15 days after the new management plan is submitted to the MPCA. (This is required by Minnesota Rules Part 7045.0240, subpart 2.)
2. If the chemical constituents of any of the wastes listed above change, the MPCA must be notified. Call or write the Disclosure Unit.

Additionally, if volume, registered transporter or facility, or method of disposal change, contact the Disclosure Unit and note the change on your annual report.

3. Annual reports, required by Minnesota Rules Part 7045.0296, are due by March 1 of each year. This report must describe hazardous waste generation, handling, and disposal activity for the preceding year. The next annual report from Franklin Mfg. will be due March 1, 1986. Forms will be supplied by the MPCA after January 1.
4. The Franklin Mfg. EPA identification number, MND092304856, must be used on all hazardous waste labels and on shipping papers when shipment is made to an off-site facility. (Labeling and shipping paper requirements are described in Minnesota Rules Part 7045.070, subpart 5, and Part 7045.0261, subpart 7). As of September 20, 1984 the federal Environmental Protection Agency is requiring the use of a Uniform National Manifest. All manifests should be sent to the MPCA at:

Minnesota Pollution Control Agency
Solid and Hazardous Waste Division
1935 West County Road B2
Roseville, Minnesota 55113-2785

5. The MPCA reviews and comments upon the hazardous waste disclosure and management plans solely for the purpose of determining whether there is a reasonable assurance that Franklin Mfg. is managing its hazardous wastes in accordance with MPCA rules. In issuing this approval, the State and the MPCA assume no responsibility for any damages to persons, property, or the environment which may be caused by the hazardous waste generated by Franklin Mfg., regardless of whether or not the waste is managed in accordance with the approved management plan.

If you have any questions regarding this approval, need any forms, generate new wastes, change handling practices, or have any other questions or requests regarding hazardous waste generation, please call Martin Little of my staff at 612/296-7170.

Sincerely,

Original Signed

[Signature]
Rodney E. Massey, P.E.
Chief, Regulatory Compliance Section
Solid and Hazardous Waste Division
REM/MHL:ls

See Larry Shaw

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MINNESOTA GENERATOR INSPECTION CHECKLIST

I. General Inspection Information

Site Name Franklin Manufacturing, Inc EPA ID Number MND-092-304-856
Address 701 33rd. Ave. No.
City ST. Cloud Zip Code 56301 County Stearns
Company Status ☒ SQG ☒ G ☐ H

Current Number of Employees at Site ~ 950

Inspection Date 7/11/85 Time (From) 10:00 (To) 11:30

Inspector(s)	Title	Telephone
<u>Michael J. Tibbatts</u>	<u>P.C.S., Sr</u>	<u>612/297-1783</u>

Person(s) Interviewed	Title	Telephone
<u>Richard Clute</u>	<u>Env. Eng. Supr.</u>	<u>612/253-1212</u>

Date of last MPCA Inspection 7/17/84

II. Disclosure/Licensing/Permits/Identification

1. Identification - Waste Table (Optional)

Waste Name	Quantity Generated	Remarks
<u>FOO2 (Methylene chloride)</u>	<u>see disclosure</u>	<u>Waste Research's Reckin</u> <u>TSD</u>
<u>FOO5 (Paint Thinner xylene Toluene)</u>	<u>.</u>	

	<u>Y</u>	<u>N</u>	<u>Remarks</u>
2. a. Outstate - Has G submitted a disclosure to the MPCA? Date _____	<u>✓</u>	_____	_____

OR

b. Metro - Does G have an approved license? Date of last county inspection? _____	_____	_____	_____
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3. Does G burn wastes on-site?	_____	<u>✓</u>	_____
4. Does G sewer wastes in accordance with MWCC, <u>POTW</u> or septic tank?	<u>✓</u>	_____	<u>City of St Cloud</u>
5. Are all evaluations needed for HW determinations available?	<u>✓</u>	_____	_____

III. Manifests (7045.0261, .0265: P. 58 - 60)

	<u>Y</u>	<u>N</u>	<u>Remarks</u>
1. Are copies of manifests available for review?	<u>✓</u>	_____	_____
2. Do manifests contain the following?	<u>✓</u>	_____	_____
a. Manifest document number	<u>✓</u>	_____	_____
b. Generator data	<u>✓</u>	_____	_____
c. Transporter data	<u>✓</u>	_____	_____
d. Facility data	<u>✓</u>	_____	_____
e. Waste data	<u>✓</u>	_____	_____
f. Certification	<u>✓</u>	_____	_____
3. Manifest tracking			
a. Are copies sent to HWIMS in set time frames?	<u>✓</u>	_____	_____
b. Were any manifest discrepancies noticed?	_____	<u>✓</u>	_____

Discrepancies: NA

	<u>Y</u>	<u>N</u>	<u>Remarks</u>
c. Does G retain copies for 3 years?	<u>✓</u>		
4. Does G import or export HWs?		<u>✓</u>	

IV. Small Quantity Generators (7045.0219: P. 53-54)

1. Are containers marked with the words "Hazardous Waste?"	<u>✓</u>	<u> </u>	<u> </u>
2. Outdoor storage requirements:	<u> </u>	<u> </u>	<u> </u>
a. Protected from unauthorized entry and inadvertent damage?	<u> </u>	<u> </u>	<u> </u>
b. Are free liquids placed on a curbed impermeable surface?	<u> </u>	<u> </u>	<u> </u>
c. Are ignitable wastes shaded from direct sunlight?	<u> </u>	<u> </u>	<u> </u>

3. Remarks _____

V. Personnel Training/Preparedness and Prevention/Contingency Plan

	<u>Y</u>	<u>N</u>	<u>Remarks</u>
1. Personnel Training (7045.0558: P. 213-214)			
Do personnel training records identify or include:			
a. Program director	<u>✓</u>	<u> </u>	<u>Franklin has hired a</u>
b. Job titles	<u>✓</u>	<u> </u>	<u>R.N. as a training Director</u>
c. Job descriptions	<u>✓</u>	<u> </u>	<u> </u>
d. Documented new employee training	<u>✓</u>	<u> </u>	<u> </u>
e. Documented annual training	<u>✓</u>	<u> </u>	<u> </u>
f. Training records retained	<u>✓</u>	<u> </u>	<u> </u>
2. Preparedness and prevention (7045.0566: P. 216-218)			
a. Is the required emergency equipment available?			
1) Internal communications or alarm system	<u>✓</u>	<u> </u>	<u> </u>
2) Emergency telephone or device	<u>✓</u>	<u> </u>	<u> </u>
3) Fire control equipment	<u>✓</u>	<u> </u>	<u> </u>
4) Spill control equipment	<u>✓</u>	<u> </u>	<u>Floor dry, recovery drum ect.</u>
b. Does G provide for testing and maintenance of emergency equipment?	<u>✓</u>	<u> </u>	<u> </u>
c. Is aisle space adequate?	<u>✓</u>	<u> </u>	<u>Need to be widened</u>
d. Is water and/or foam available for fire control?	<u>✓</u>	<u> </u>	<u> </u>
3. Contingency Plan (7045.0572: P. 218-221)			
a. Is a copy of the contingency plan at the facility?	<u>✓</u>	<u> </u>	<u> </u>
b. Does the plan specify emergency response actions?	<u>✓</u>	<u> </u>	<u> </u>

	<u>Y</u>	<u>N</u>	Remarks
c. Has G made and documented arrangements with local authorities?	<u>✓</u>	—	_____
d. Does the plan list emergency coordinator data?	<u>✓</u>	—	_____
e. Do emergency coordinators have the authority to act?	<u>✓</u>	—	_____
f. Does the plan list emergency equipment?	<u>✓</u>	—	_____
g. Is there an evacuation plan?	<u>✓</u>	—	_____

VI. Pretransport Requirements (7045.0270: P. 60-61)

Applicable DOT Regulations: CFR Title 49, Parts 172, 173 and 178 (1983)

1. When shipped off-site, are the hazardous wastes:

- | | | | |
|---|----------|----------|--|
| a. In approved DOT containers? | <u>✓</u> | — | <u>drummed solids need to be repackaged before shipping off-site</u> |
| b. Marked and labeled in accordance with DOT regulations? | <u>✓</u> | — | |
| c. Placarded in accordance with DOT regulations? | — | <u>✓</u> | |

VII. Storage Requirements (7045.0270, .0292 .0626, .0628: P.60-64, 266-269)

1. What storage method is used?

✓ Containers (2)

— Tanks (3)

2. Are hazardous waste managed to prevent releases? (.0566, P. 217) ✓

3. Container Storage

- | | | | |
|---|----------|---|-------|
| a. Are weekly inspections conducted? | <u>✓</u> | — | _____ |
| b. Are accumulation start dates clearly marked? | <u>✓</u> | — | _____ |

	Y	N	Remarks
c. Have 90 days elapsed since the dates marked?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	9 drums accumulated > 90 days. Franklin is
d. Are containers marked with the words "Hazardous Waste?"	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Working with H.W. permits in closure (by 8/31/85)
e. Are containers in good condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
f. Are containers compatible with wastes stored?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
g. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
h. If ignitable or reactive wastes are present, are they stored at least 50 feet from property line?		NA	NA
i. Are incompatible wastes separated?	<input type="checkbox"/>	<input type="checkbox"/>	NA
j. Outdoor storage requirements:			
1) Protected from unauthorized entry and inadvertent damage.	<input type="checkbox"/>	<input type="checkbox"/>	indoor storage only
2) Are free liquids placed on a curbed impermeable surface?	<input type="checkbox"/>	<input type="checkbox"/>	
3) Are ignitable wastes shaded from direct sunlight?	<input type="checkbox"/>	<input type="checkbox"/>	

4. Tank Storage (7045.0270, .0628: P. 61, 268-269)

Tank Location	_____
Total Capacity/Current Volume	_____
Diameter	_____
Distance from Property Line	_____
MPCA liquid storage permit?	_____

- a. Are daily inspections made?
(waste level, control and monitoring equipment) _____

	Y	N	Remarks
b. Are weekly inspections made to detect tank corrosion or leaking?	___	___	___
c. Is each tank clearly marked with the words "Hazardous Waste?"	___	___	___
d. Is the accumulation start date marked or recorded?	___	___	___
e. Have 90 days elapsed since the date marked?	___	___	___
f. Are tanks compatible with stored wastes?	___	___	___
g. Are incompatible wastes stored in separate tanks?	___	___	___
h. If uncovered tanks are used, is 60 cm (2 feet) freeboard present <u>OR</u> a containment, drainage, or diversion structure present?	___	___	___
i. Do continuous feed systems have a waste-feed cutoff?	___	___	___
j. Are ignitable or reactive wastes stored in tanks?	___	___	___
k. Is the tank a pretreatment unit?	___	___	___
If yes: (7045.0652: P. 285-286)			
1) Does operator have inspection schedule?	___	___	___
2) Does operator have inspection log?	___	___	___

VIII. Miscellaneous

1. Company Products Home Freezers

2. Can the generator describe past hazardous waste management? Explain below:

Some wastes were burned at Midway Iron and disposed of at St. Augustine SLF (see disclosure)

Remarks:

Overall, Franklin appears to be in compliance with Chapter 7045. requirements. The company is currently working with the h.w. permits unit to resolve the closure of their interim storage facility by August 31, 1985.

MINNESOTA POLLUTION CONTROL AGENCY
COMPLAINT REPORT

956 H

County: Stearns Date Received: 1/29/85
City: St. Cloud Time Received: ~10:30 a.m.
Region: Brainerd Received By: Michael P. Convery

Source of Alleged Pollutant:

Name: former Franklin manufacturing Facility
Address: ~ North 8th Street N. - west of 33rd Ave No.

City: St. Cloud

Phone: _____

Sec. _____ Twp. _____ Range _____ W

Location: _____

Problem/Situation Description:

On the west end of the Franklin facility property is a 20' deep pit used for waste disposal. The bottom of the pit was gravel. Waste, including methyisocyanate, methylene chloride, caustic soda, and chromium, were discharged to the pit at 80 gpm. Franklin manufactured freezers and had the facility at location since the 1940's. The pit was used for at least 15 years during the 1960's through early 1970's. It claimed MPCA supervised some cleanup during some work on TH 15 right-of-way.

Inspection Findings:

Action Taken/Comments:

Complaint forwarded to David Richfield / Robert Kuck as part of small Waite Park investigation